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**From:** Krasnic, Toni [krasnic.toni@epa.gov]  
**Sent:** 6/26/2018 7:11:07 PM  
**To:** Williamson, Tracy [Williamson.Tracy@epa.gov]; Vendinello, Lynn [Vendinello.Lynn@epa.gov]  
**CC:** Lehman, Timothy [Lehman.Timothy@epa.gov]  
**Subject:** Long-chain PFAS

Hi Tracy,

Below is the definition of long-chain PFAS we used in SNURs ([see § 721.10536](#)). This definition was developed by CCD and CESSD (lead was Greg Fritz). OECD, FluoroCouncil, Canada, and other countries are using long-chain definitions consistent with this definition.

(b) Chemical substances and significant new uses subject to reporting. (1) The chemical substances identified below, where  $5 < n < 21$  or  $6 < m < 21$ , are subject to reporting under this section for the significant new uses described in paragraph (b)(4)(i) and (b)(4)(iv) of this section.

(i)  $\text{CF}_3(\text{CF}_2)_n\text{-COO M}$  where  $\text{M} = \text{H}^+$  or any other group where a formal dissociation can be made.

(ii)  $\text{CF}_3(\text{CF}_2)_n\text{-CH=CH}_2$ .

(iii)  $\text{CF}_3(\text{CF}_2)_n\text{-C(=O)-X}$ , where X is any chemical moiety.

(iv)  $\text{CF}_3(\text{CF}_2)_m\text{-CH}_2\text{-X}$ , where X is any chemical moiety.

(v)  $\text{CF}_3(\text{CF}_2)_m\text{-Y-X}$ , where Y = non-S, non-N heteroatom and where X is any chemical moiety.

All PFAS with  $n \leq 5$  and  $m \leq 6$  are considered short-chain PFAS.

Thanks,

Toni Krasnic  
Existing Chemicals Branch  
EPA/OCSP/OPPT/CCD/ECB  
WJC East, 4134D | (202) 564-0984